

**AFFIDAVIT OF ATTORNEY DANIEL ADAMS
IN SUPPORT OF MOTION TO EXTEND TIME TO FILE DISPOSITIVE AND
NON-DISPOSITIVE MOTIONS**

STATE OF WISCONSIN)
) ss
MILWAUKEE COUNTY)

I, Daniel Adams, being duly sworn, provide the following facts to be considered in a concurrently filed Motion to Extend Time to File Dispositive and Non-Dispositive Motions in United States District Court for the Eastern District of Wisconsin Case No: 17-cv-00426-L.A.

1. I am the attorney of record for Plaintiffs in Case No: 17-cv-00426-L.A.
2. I have engaged in reciprocal discovery with Defendants' counsel. This has included numerous "meet and confer" communications to limit the scope of sought materials and avoid filing motion(s) to compel. Currently, I believe there are still outstanding discovery items to be produced by each Party.
3. On Thursday, July 26, 2018, I received a large file containing financial information from defense counsel. This information has been sought since January 18, 2018.
4. Also on Thursday, July 26, 2018, I received login permission to the Clover point-of-sale (POS) system from defense counsel. The system contains additional financial records. This information had been sought since January 18, 2018.
5. My clients believe that the financial records provided on July 26, 2018 must be reviewed by a Certified Public Accountant to understand whether the entirety of our sought discovery materials have been provided and whether the case should

be advanced by the filing of dispositive motion(s)).

6. My clients have scheduled an appointment with a qualified Certified Public Accountant to review the recently provided data. This meeting is scheduled for August 1, 2018.
7. My clients are committed to working collaboratively to avoid burdening this Court's time with unnecessary motions to compel or dispositive motion(s). Further, my clients are open to a negotiated settlement of this case and believe a review of the produced financial records will advance negotiations.
8. I believe good cause exists for this Court to extend time limits on both dispositive and non-dispositive motions in this case.

Dan. Adams
Daniel Adams

Subscribed and sworn to before me

A. Adams
this 31st day of July, 2018
Notary Public, State of Wisconsin
My commission expires is permanent

